

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Residents Energy, LLC	:	
	:	
Application for Certificate of	:	Docket 16-0361
Service Authority under Section	:	
19-110 of the Public Utilities Act.	:	

Response to Notice of Administrative Law Judge's Request for Additional Information

Residents Energy, LLC ("Residents") hereby responds to the Administrative Law Judge's ruling of June 30, 2016 requesting additional information as follows:

- 1. Pursuant to Section 551.30(a) of the Commission's Rules, the Applicant needs to show notice of its application for certification in the Official State Newspaper within 10 days following the filing of the application for certification. The applicant shall file proof of publication with the Clerk of the Commission by July 7, 2016.**

Notice of Applicant's application for certification was published in the Breeze Courier on June 29, 2016. Proof of publication was filed with the Clerk of the Commission on July 7, 2016.

- 2. Section 551.30(c) - Applicant stated that it intends to serve all eligible customer classes for North Shore Gas Company, Nicor Gas, and Peoples Gas. The Applicant should expressly state which customer classes it intends to serve – small commercial and residential. The statement that Applicant will serve only small commercial customers for Ameren is correct the way it is.**

Applicant's response to Item #9 of the Application is hereby amended to read as follows. "Residents Energy intends to serve small commercial and residential customers in the North Shore Gas Company, Nicor Gas, and Peoples Gas service Territories, and small commercial customers in the Ameren service territory."

- 3. Section 551.30(c)(2) - Item #10 states the Applicant intends to serve all residential and small commercial gas customers without exception. Ameren's territory is open to competition for only small commercial customers. The statement could be amended to say that Residents Energy plans to serve all residential and small commercial customers in the territories of North Shore Gas Company, Nicor Gas, and**

Peoples Gas and to serve all small commercial customers in Ameren Illinois' territory.

Applicant's response to Item #10 of the Application is hereby amended to read as follows. "Residents Energy plans to serve all residential and small commercial customers in the territories of North Shore Gas Company, Nicor Gas, and Peoples Gas and to serve all small commercial customers in Ameren Illinois' territory."

- 4. Section 551.30(c)(3) - Item #11 and Attachment B to the application includes the notification letters sent to the utilities. All of the letters state that the Applicant will serve residential, commercial, and industrial customers. The letters to Peoples, Nicor, and North Shore should be modify to state Applicant will serve residential and small commercial customers. The letter to Ameren should be changed to state Applicant will serve small commercial customers only. The letters should be dated with the current date and resent.**

Please see copies of the corrected letters of July 1, 2016, attached hereto as Attachment "A."

- 5. Section 551.80(f)(3) requires that the revolving credit agreement shall be valid for a period of not less than one year. It appears that the loan agreement with JP Morgan Chase Bank has expired, as the maturity date was April 30, 2016. Applicant shall explain whether the loan agreement was modified and provide documentation to that effect.**

The loan agreement was modified in April. Please see copy of Fourth Modification Agreement, dated April 30, 2016, attached hereto as Attachment "B."

Wherefore, Residents Energy, LLC requests that the Commission grant its application for service authority to serve residential and small commercial natural gas customers in the North Shore Gas Company, Nicor Gas, and Peoples Gas service territories, and small commercial natural gas customers in the Ameren service territory in Illinois.

Date: July 8, 2016

S/S GERARD T. FOX
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NOTICE OF FILING

Please take note that on July 8, 2016, I caused to be filed via e-docket with the Chief Clerk of the Illinois Commerce Commission, the attached Response to Notice of Administrative Law Judge's Request for Additional Information on behalf of Residents Energy, LLC in this proceeding, ILL. C. C. Docket 16-0361.

/s/GERARD T. FOX
Gerard T. Fox

CERTIFICATE OF SERVICE

I, Gerard T. Fox, certify that I caused to be served copies of the foregoing Response to Notice of Administrative Law Judge's Request for Additional Information on behalf of Residents Energy, LLC upon the parties on the service list maintained on the Illinois Commerce Commission's eDocket system for Ill. C. C. Docket 16-0361 via electronic delivery on July 8, 2016.

/s/ GERARD T. FOX
Gerard T. Fox